

Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building P.O. Box 2063 Harrisburg, PA 17105-2063

September 29, 2003

Secretary

717-787-2814

Mr. Jeff Klieve, PTPA Chair Director, Environmental Affairs Monsanto Company Performance Track Participants Association One Thomas Circle, NW Tenth Floor Washington, DC 20005

Dear Mr. Klieve:

We applaud the work of the Performance Track Participants Association (PTPA) and support the continued expansion of EPA's Performance Track (PT) program throughout Pennsylvania. At present, 15 Pennsylvania facilities are enrolled in the PT program. Pennsylvania facilities are increasingly committed to continuous environmental improvement and tangible results.

For some time we have been reviewing opportunities to provide greater regulatory flexibility for Pennsylvania facilities. We are developing a Memorandum of Understanding to provide whatever flexibility we can to promote greater involvement in the PT program. Low inspection priority, insofar as our responsibility to maintain and enforce federal standards is not jeopardized, is one component that we are considering. You can help by insuring that the EPA provides the states sufficient legal and rulemaking flexibility to "mirror" theirs.

We can also work together to promote the PT program via the Businesses for the Bay (B4B) program, funded by the EPA's Chesapeake Bay Program. This is a voluntary, pollution prevention/energy efficiency program among the states of Maryland, Pennsylvania, Virginia, West Virginia, and the District of Columbia. By 2005 B4B's goals are to have 1,000 members, 300 mentors, and to prevent at the source or recycle 1 billion pounds of hazardous substances (from 1999 levels).

Two of the Pennsylvania PT program members cited in your letter are B4B members.

Another, Pfizer, Inc., is a member of both the Pennsylvania B4B workgroup and the EPA Region III Performance Track Regional Network Group. B4B acts as a portal into all of our environmental management services. It seeks to integrate, rather than duplicate, the environmental efforts of its members. Consequently, the PT program represents an integral component of that effort.

If you have any questions or need further information, you may contact Mary Lynn Wilhere, B4B regional coordinator, at the Chesapeake Bay Program Office, at 1-800-YOUR-BAY, Ext. 719. Furthermore, we welcome your encouragement for all your eligible members to join and support the B4B program.

Sincerely,

Kathleen A. McGinty

Secretary